

General Information

A complete application to discharge consists of the following documents: application to discharge form, any applicable categorical questionnaires included in the package, air questionnaire and Table 2 of the air questionnaire. All requested information should be completed electronically on the forms. You should submit in hard copy for your record copy with signatures, but please provide an identical copy of the Word and Excel documents to facilitate electronic transfer of your data.

GCA's application review process will include an initial administrative review. If an incomplete or inconsistent application is received by GCA, the applicant will have to provide a completed or corrected application. Hints regarding some administrative and technical review items are shown on the attached helpful tips sheet. The technical review portion of the application process will not begin until the application is deemed administratively complete.

GCA is also requesting a Baseline Monitoring Report for the industrial users subject to a categorical pretreatment standard. Note that a Baseline Monitoring Report is industrial user specific. (i.e., if two industrial users are utilizing the same discharge point, then each industrial user subject to a categorical pretreatment standard must complete their separate Baseline Monitoring Report.

Helpful Tips Sheet

Frequently Asked Questions

- Q. If I haven't changed anything do I have to submit a complete application?
- R. Yes, if you received this letter you need to submit a complete application to discharge as defined in the cover letter. A Baseline Monitoring Report is also required for industrial users subject to a categorical pretreatment standard. Responses should be complete and self contained in the application materials. Please do not reference previous application submittals.
- Q. Can I submit information in my own format?
- R. Requested information such as maps and flow information can be submitted in your format. Responses to waste characterization questions should be provided on the application form. Do not attach laboratory data in lieu of completing the form.
- Q. Do I have to analyze my discharge?
- R. GCA does not require that the discharge be analyzed to complete the application. However, it is not acceptable to leave a portion of any form blank because analytical data is not available. If you believe you need analytical data to complete the application, then you should obtain analytical data.
- Q. Some of the questions regarding specific constituent loadings are for the same compound in the water section and the air section. Do I have to repeat the information?
- R. Yes, during the review process different GCA personnel may be reviewing different portions of the application. Note, that if GCA notices inconsistencies in this information during the administrative review the application will require correction before any further review occurs.

Some Common Issues with Administrative Completeness and Technical Evaluation

Administrative

- Waste characterization tables are not completely filled in all rows and/or columns.
- Responses to questions are left blank or inappropriate not applicable responses (such as waste characterization questions).
- Pollutant loadings in the wastewater portion of the application to discharge do not match the same pollutant loading provided in the air questionnaire.
- Responses given for wastewater parameters such as BOD and TOC are clearly not consistent with each other.
- Responses for wastewater parameters such as BOD and TOC are clearly not consistent with the responses in the air questionnaire. For example, the total pounds of constituents is 10 lb/day and the TOC is 1000 lb/day.
- No CAS numbers or vapor pressure information for additional compounds is provided in response on the air questionnaire.
- GCA will screen responses for following types of issues:
 - The TOC is greater than the BOD or COD.
 - The BOD is greater than the COD.
 - The TDS is greater than 1000 to 2000 mg/L and the chloride or sulfate data do not match.
 - The sum of the cations and anions is not comparable to the TDS.

Technical

- If a categorical pretreatment standard applies, specify which subpart applies if the standard has subparts.
- If more than one categorical pretreatment standard applies, specify which subpart applies for each category if the standard has subparts. If compliance with one standard is allowed by the regulations

in lieu of complying with both standards, identify which standard will be complied with and the associated rationale.

- Note that the flow rate breakdown must be accurate so that GCA's Texas Pollutant Discharge Elimination System water permit, air quality permits and approved Pretreatment Program remain in compliance. An increase in the flow rate breakdown needs to be carefully evaluated by GCA to ensure regulatory compliance at the facility.
- Renewal requests representing significant increases or decreases compared to historical data will require an explanation from the applicant.
- In the air questionnaire, answer questions only pertaining to the wastewater transferred to GCA. The referenced regulations may be applicable to the operations at your facility but not to the wastewater transferred to GCA.
- If you have specialized compounds, be prepared to submit structure information and the simplified molecular input line entry specification or SMILES code.

Permits with Special Considerations

Co-Permittee Facilities

- Co-permittees are responsible for one complete, combined application to discharge as defined in the cover letter.
- Co-permittees must be identified as jointly sharing the compliance responsibility within the application to discharge or specify what parameters indicate the offensive party. This legal arrangement must be approved by GCA.
- The co-permittees must identify in the application each contribution to each discharge point into the GCA wastewater treatment plant.
- The ownership relationship between both parties must be described in the cover letter and Section 1.A. of the application to discharge.
- Both co-permittees are jointly and severally responsible for compliance with the Affluent Permit and the Rule. GCA might appoint the primary responsible party for each discharge point. The applicants may provide additional supplemental information within the application to discharge as an attachment to support the possible appointment.
- The certification statement for the application to discharge must be signed separately by each co-permittee.
- The Baseline Monitoring Report must be separate for each co-permittee facility that is subject to a categorical pretreatment standard. Any certification statements should be signed by the appropriate co-permittee as required for regulatory compliance.

Permittee Facility with a Captive Facility

- The permittee is responsible for collecting all of the information from the captive facility and incorporating this information within their application to discharge. The permittee is also responsible for collecting the appropriate required compliance documents for the captured facility required within the application to discharge. It should be noted within Section 1.B. that the permittee takes the full legal responsibility for the captive facility.
- The ownership relationship between both parties must be described in the cover letter and Section 1.A. of the application to discharge.
- Pretreatment activities at each permittee facility or captive facility for compliance purposes must be described and identified for each party.
- The certification statement for the application to discharge must be signed by permittee.
- The Baseline Monitoring Report must be separate for each permittee and captive facility that is subject to a categorical pretreatment standard. The permittee is responsible for obtaining this report from the captured facility and providing it to GCA. Any certification statements required for

regulatory compliance should be signed by the appropriate party and transmitted to GCA by the permittee facility.

Same Customer with Multiple Discharge Locations

- The Application to Discharge must be completed with specific sections identifying information for each discharge location.
- Section 2.B. should delineate the plot plans and/or flow diagrams to identify per discharge point.
- Section 2.C. should delineate the layout or locations maps per discharge point.
- Section 2.D. should identify per discharge point the internal control or disposal along with the description of the discharge specific pretreatment facility.
- Section 2.E. should identify per discharge point the provision to hold wastewater if it does not meet the acceptability criteria.
- Section 2.G. should describe per discharge point the discharge type and occurrence.
- Section 2.H. should describe per discharge point the Standard Industrial Classification Code.
- Section 2.I. should describe per discharge point the EPA Industrial Categorization/Subcategorization and Subpart, if applicable.
- Section 2.L. should identify the specific flow rates as requested per discharge point.
- The entire Section 3 should per discharge point provide the specific information requested.
- The Wastewater Characteristics, any applicable categorical questionnaires included in the package, air questionnaire and Table 2 of the air questionnaire should be provided per discharge point.
- A separate Baseline Monitoring Report must be completed for each discharge point containing a wastewater stream subject to a categorical pretreatment standard.

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Additional Consideration for New Dischargers

- **Sample Stations.** Each permitted discharge point will need a sampling point. Sampling point must match the stream that will be regulated.
- **Categorical Part/Subpart not included in standard packet for the facility.** If a categorical part and/or subpart applies to you for which GCA does not have a standard form, you will need to provide all of the pertinent information such a flow, production or characterization identified in that part and/or subpart.